

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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)	
IN RE: CLARA A. SANTINI)	BANKR. NO. 17-20655-CMB
)	
Debtor)	Chapter 13
)	
)	Hearing Date: 7/19/17
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TOYOTA MOTOR CREDIT CORPORATION))	
)	
Movant)	
)	
v.)	
)	
CLARA A. SANTINI)	
)	
Respondent)	

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Debtor and Respondent, Clara A. Santini, by and through her counsel, Joseph B. Aguglia Jr., Esq., hereby responds to Movant's Motion for relief from the automatic stay and in support thereof, aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Strict proof is required at hearing.
7. Denied. Strict proof is required at hearing.
8. Denied. Strict proof is required at hearing.
9. Denied. Strict proof is required at hearing.

10. (a) Denied. Strict proof is required at hearing.

(b) Denied. Strict proof is required at hearing.

WHEREFORE, Debtor and Respondent, Clara A. Santini, respectfully requests that this Honorable Court dismiss and deny the Motion for Relief from the Automatic Stay in its entirety.

Respectfully Submitted,

DATE: 6/19/2017

/s/ Joseph B. Aguglia Jr., Esquire
Joseph B. Aguglia Jr., Esquire
PA ID #94516
1001 State Street
Suite #1400
Erie, PA 16501
(814) 480-5790
jaguglia@verizon.net